

**IN THE UNITED STATES
DISTRICT COURT FOR THE
NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

John Doe,

Plaintiff,

v.

The Partnerships and Unincorporated Associations
Identified on Schedule “A”,

Defendants.

Case No. 1:24-cv-05089

Judge Jorge L. Alonso

Magistrate Judge Maria Valdez

Plaintiff’s Ex Parte Motion to Extend the Temporary Restraining Order

NOW COMES John Doe (“Plaintiff”), by and through his undersigned counsel, pursuant to Fed. R. Civ. P. 65(b)(2), and seeks to extend the Temporary Restraining Order (“TRO”) granted and entered by the Court on August 26, 2024 (Dkt. 16) by a period of fourteen (14) days until September 9, 2024.

Federal rules provide that a TRO entered without notice may be extended upon a showing, prior to expiration of the TRO, of good cause for such an extension. Fed. R. Civ. P. 62(b)(2). Plaintiff respectfully submits that such good cause exists to extend the TRO as a result of the high probability that the Defendants will continue to harm Plaintiff without the TRO being in place including, without limitation, relocating funds into inaccessible offshore financial and bank accounts. As discussed in Plaintiff’s Motion for Entry of the TRO (Dkt. 9), and as this Court found, this possibility of harm is significant. In light of the foregoing, Plaintiff respectfully requests that the TRO be extended for a period of fourteen (14) days until September 23, 2024.

Dated: September 4, 2024

/s/Zhiwei Hua
1360 Valley Vista Dr, Suite 140,
Diamond Bar CA 91765
Bar No. 6099105
huazhiwei@concord sage.com
Phone: (216)3923236

ATTORNEY FOR PLAINTIFF